

D. Remarks

The claims are 1-3, 5-54 and 56-59, with claims 1, 27, 28, 54 and 56 being independent. Claims 28-54 and 56 have been withdrawn from consideration. Claims 4 and 55 have been cancelled. Claims 1 and 27 have been amended to clarify the present invention. Support for this amendment may be found throughout the specification and the drawings, for example in Figs. 1A-B and 5A-B. Claims 2, 3, 5-7, 9-11, 18 and 19 have been amended to reflect the changes in claim 1 and to improve their form, in accordance with the specification and the drawings. Claims 20-22 have been amended to improve their form. New claims 56-58 have been added. Support for these claims may be found throughout the specification and the drawings, for example in Figs. 1A-B and 5A-B. Also, the specification has been amended to correct spelling errors. No new matter has been added. Reconsideration of the claims is expressly requested.

Under M.P.E.P. § 821.04, Applicants again request rejoinder of the claims of Group II, directed to the method of using the apparatus of Group I, in the event that the claims of Group I are allowed. If needed, Applicants request an opportunity to amend the claims of Group II to be commensurate in scope with claims allowed in Group I.

Claim 1 is objected to because of an informality. In view of the above amendment to claim 1, this objection should be withdrawn.

Claims 1, 3, 4, 6-8, 27 and 55 stand rejected under 35 U.S.C. § 102(b) as being allegedly anticipated by U.S. Patent No. 4,189,363 (Beitzel). Claims 2, 9-19 and 22-26 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Beitzel. Claims 20 and 21 stand rejected under 35 U.S.C. § 103(a) as being allegedly obvious from

Beitzel in view of U.S. Patent No. 6,217,834 B1 (Hosein). Claim 5 stands rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Beitzel in view of U.S. Patent No. 6,299,844 B1 (Tao). The grounds of rejection are respectfully traversed.

Prior to addressing the merits of rejection, Applicants would like to briefly review some of the features and advantages of the presently claimed invention. The invention, as presently claimed, is directed to an apparatus, which is used to decompose pollutants. The apparatus has a case for receiving a pollutant that is to be decomposed. This case can also contain a light source, which emits light needed to decompose the pollutant. To improve the efficiency of the decomposition, a light reflector is placed outside the case containing the pollutant. As an alternative to placing the light source inside the case containing the pollutant, both the light source and the case containing the pollutant can be placed in another case, which contains a light reflector, to obtain the above-mentioned advantageous decomposition.

Beitzel is directed to the purification of water using ozone and UV light. Beitzel utilizes an apparatus having a housing 16 comprising a cylindrical tube 18, which is placed around the lamp 12. The housing also contains ends 26, which together with the wall 22 and the cylindrical tube 18, form a container in which water is purified. The inside of this container can include a reflective surface 24.

Beitzel, however, is clearly different from the invention as presently claimed. First, the lamp in this reference is outside of the container where the purification takes place, separated therefrom by a cylindrical tube 18. In fact, it is preferable that an air gap exist between the tube and the lamp (col. 3, lines 8-18). There is no disclosure or

suggestion in Beitzel of a light source positioned inside the case, as recited in present claim 1.

Second, the reflective surface in Beitzel is inside the container. In fact, this surface is preferably removed from the outside wall (col. 3, lines 19-31). There is no disclosure or suggestion in Beitzel of a light reflect outside the case, as recited in present claim 1.

Third, Beitzel does not disclose or suggest more than one case, which is required by present claim 27. As discussed above, Beitzel discloses a single container, which comprises the tube 18 as its internal wall, ends 56 as its upper and lower walls and outer wall 22. Therefore, it is clear that Beitzel cannot affect the patentability of the presently claimed invention.

Hosein cannot provide the teachings that are missing in Beitzel. The Examiner cited Hosein for the alleged teaching of the presently claimed UV wavelength range. However, even if assumed, *arguendo*, that Hosein contains such a teaching, this reference, like Beitzel, does not disclose or suggest an apparatus in which either (i) the light source is inside the case and the light reflector is outside the case, or (ii) a two-case system as recited in claim 27. Accordingly, the presently claimed invention is clearly patentable over Hosein and Beitzel.

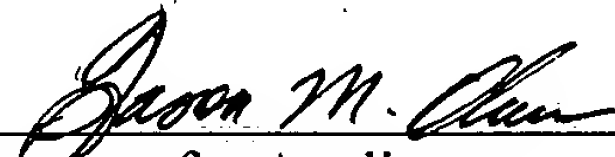
Tao also cannot cure the deficiencies of Beitzel. The Examiner cited this reference for the alleged teaching of a reflective film being formed on the outside of the case. However, even if assumed, *arguendo*, that Tao contains such a teaching, this reference, like Beitzel, does not disclose or suggest an apparatus in which either (i) the

light source is inside the case and the light reflector is outside the case, or (ii) a two-case system as recited in claim 27. Accordingly, the presently claimed invention is clearly patentable over Tao and Beitzel.

In conclusion, Applicants respectfully submit that none of the cited references, whether considered separately or in any combination, disclose or suggest the combination of elements presently claimed. Wherefore, Applicants respectfully request that the outstanding objection and rejections be withdrawn and that the present case be passed to issue.

Applicants' undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our address given below.

Respectfully submitted,



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